

Exhibit 15-6
Historically Black Colleges and Universities (HBCUs)

6509.2 REV-5

Guide for Review of HBCU Procurement			
Name of Program Participant:			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: This Exhibit is designed to evaluate the HBCU's compliance with procurement requirements as described in 24 CFR 84.44.

Questions:

1.

Can the HBCU document receipt of an adequate number of price or rate quotations from qualified sources for procurements of \$100,000 or less? [24 CFR 84.46]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion: 	

2.

For the sample reviewed, did the HBCU have documentation on file to show that at least two or more responsible bids for the selected procurement transactions? [24 CFR 84.46]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion: 	

3.

Does the sample of procurement transactions reviewed show that contracts were awarded to the lowest responsive and responsible bidders? [24 CFR 84.44-48]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

4.

Is the HBCU ensuring that its awards are not made to any party excluded, disqualified, or otherwise ineligible (e.g., suspension, debarment, or limited denial of participation) for Federal procurement and nonprocurement programs? [24 CFR Part 24, Subparts C and J; 48 CFR 9.4; Executive Order 13224, implemented at 31 CFR Parts 595-597]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

5.

Are procurement procedures in place to ensure that purchase orders and contracts are signed by an authorized program official? [24 CFR Part 84]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

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6.

<p>Does the HBCU have a written code of conduct governing employees, officers or agents engaged in the award and administration of contracts supported by HBCU funds? [24 CFR 84.42]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div></div>
<p>Describe Basis for Conclusion:</p> <div style="height: 100px;"></div>	

7.

<p>Can the HBCU demonstrate that its subgrantees are required to follow procurement policies and procedures in the administration of their contracts? [24 CFR 84.48]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div></div>
<p>Describe Basis for Conclusion:</p> <div style="height: 100px;"></div>	

8.

<p>If contracts have been awarded for construction or facility improvements under the HBCU program, does the HBCU follow its own requirements relating to bid guarantees, performance bonds for construction contracts or subcontracts valued at or below \$100,000? [24 CFR 84.4(c)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p> <div style="height: 100px;"></div>	

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9.

<p>If contracts have been awarded for construction or facility improvements under the HBCU program, does the HBCU meet the minimum Federal requirements for bid guarantees, performance bonds and payment bonds for construction contracts or subcontracts valued above \$100,000? [24 CFR 84.48]</p>	<div> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	